

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

CBV, INC.,	)	
	)	
Plaintiff,	)	
v.	)	C.A. No. 1:21-cv-01456-MN
	)	
CHANBOND, LLC, DEIRDRE LEANE,	)	
and IPNAV, LLC,	)	
	)	
Defendants.	)	

**DEIRDRE LEANE AND IPNAV, LLC’S ANSWER TO CHANBOND, LLC’S  
COUNTERCLAIM**

Defendants/Counterclaimants/Cross-claimants Deirdre Leane (“Leane”) and IPNAV, LLC (“IPNAV” and, collectively with Leane, “Leane Defendants”), as and for their Answer to the Counterclaim to Vacate Arbitration Award filed by Defendant ChanBond, LLC, respond and allege as follows:

**INTRODUCTION**

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admit that the referenced arbitration clause provides that an application to vacate any arbitration award in any Court of competent jurisdiction, which includes this district.

**COUNT I TO VACATE ARBITRATION AWARD PURSUANT TO 9 U.S.C. § 10**

7. Admitted.
8. Admitted.

9. Admitted.
10. Admit that the hearing in the arbitration proceeding commenced on October 18, 2021.
11. Admitted.
12. Denied.
13. Denied.
14. Denied.
15. Denied.

**FIRST AFFIRMATIVE DEFENSE**

16. The claims raised in the Counterclaim are barred by the doctrines of waiver and estoppel.

**PRAYER FOR RELIEF**

**WHEREFORE**, Leane Defendants request that the Counterclaim be denied in its entirety and the arbitration award confirmed.

Respectfully submitted,

**OF COUNSEL:**

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Dated: June 10, 2022

/s/ James H. S. Levine

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*Attorneys for IPNAV, LLC and Deirdre Leane*

**CERTIFICATE OF SERVICE**

I hereby certify that on June 10, 2022, I filed the foregoing Deirdre Leane and IPNAV, LLC's Answer to ChanBond, LLC's Counterclaim using CM / ECF, which will send notification of such filing to all counsel of record.

/s/ James H. S. Levine  
James H. S. Levine (DE No. 5355 )